

Exhibit 15

RANDAZZA

LEGAL GROUP

J. Marshall Wolman, JD
Licensed in CT, MA, NY, DC

12 January 2022

Via U.S. Mail and Electronic Mail

GoLocalProv, LLC
128 North Main Street
Providence, RI, USA 02903

GoLocalProv, LLC
c/o The Fenton Group
44 Weybosset Street
Providence, RI 02903



Re: GoLocalProv.com Copyright Infringement
Our client: Kristen Pierson
Copyright Reg. No.: VA0001926344

Dear Mr. Fenton &/or Editors of GoLocalProv:

We have the pleasure of representing Ms. Kristen Pierson, the professional photographer whose copyright-protected photograph of Robert Nardolillo, Copyright Reg. No. VA0001926344, was unlawfully used in your online news articles including, but not limited to, those published on December 30, 2021. Your unlawful infringement can be currently found at the following URLs:

Article URL:

<https://www.golocalprov.com/politics/gop-split-on-representative-morgans-fate-it-may-be-left-to-shekarchi>

Image URL:

https://www.golocalprov.com/cache/images/remote/https_s3.amazonaws.com/media.golocalprov.com/Politics/Bobby_Nardolillo_400_400.png

By law she has the exclusive right to use and license this image, and neither you or any Fenton Group or GoLocalProv are affiliated with sought or obtained a current license.

This is not the first time you infringed my client's image nor the first time you have been advised of this infringement. I am attaching, for your reference, a copy of correspondence between you and my client of November 1, 2018, in which she informed you of at least five other instances of unlawful infringement, which infringement is ongoing.

100 Pearl Street, 14th Floor, Hartford, Connecticut 06103

jmw@randazza.com | 702.420.2001

GoLocalProv.com

Notice of Copyright Infringement

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Your response to my client in 2018 was the wrong response. You argued with her that the subject of the photograph gave it to you. She advised you Mr. Nardolillo did not have a license to distribute it to you. You consciously disregarded her notice, refusing to remove it. And, your attorney, who you copied (Ms. Rachelle Green of Cervenka Green & Ducharme, LLC) presumably advised you of this.¹

Pursuant to 17 U.S.C. 201(a), copyright vests in the author at the moment of fixation. Ms. Pierson is the author, as the photographer (I am certain you do not think Mr. Nardolillo took such a professional photo as a selfie). Thus, unless you have evidence of it being a work for hire, of an assignment of copyright, or of a broad license to Mr. Nardolillo, which my client is certain you lack, you have no basis on which to contest my client's claim that your display of the image is infringing.

If we were being charitable, we can understand your misunderstanding prior to November 1, 2018. But, once my client informed you that your use was infringing, you should have immediately ceased using the image. You did not do so. Instead, you told her, effectively, to pound sand and you have continued to use the image, and generated advertising revenue thereon, making new copies as recently as December 30, 2021. What may have been an innocent infringement before can no longer be deemed anything but being willful under 17 U.S.C. § 504(c)(2), exposing you to statutory damages up to \$150,000 and our attorneys' fees.

Moreover, you did not even have the courtesy to credit Ms. Pierson as the photographer. Instead, you claim copyright in everything on your website as being vested in "GoLocalProv", per the menu side bar, and claim that the image belongs to you in your Terms and Conditions.² This knowingly false provision of copyright management information is in clear furtherance of your scheme to facilitate and conceal your infringement of my client's copyright, in violation of 17 U.S.C. § 1202, exposing you to statutory damages up to \$25,000 for each violation and our attorneys' fees.

The continued use of these images is unlawful activity, and our client is prepared to initiate legal proceedings and seek all available damages and remedies available under federal law. These damages continue to increase each day and are compounded by willful infringement and intentional misconduct. We demand that you immediately cease and desist from your unlawful activities.

We further demand that you confirm, in writing, that you have ceased use of all of the images in any print or electronic media, but preserve a copy of each for use as evidence if needed in a legal proceeding. This includes: websites, social media platforms, and printed advertisements. We also demand that you cease and desist from claiming copyright in works you do not own.

¹ Although you copied Attorney Green, she did not correspond with my client, and, as such, we are writing to you directly, as she has not identified herself as representing you in this matter.

² See <https://www.golocalprov.com/terms> ("This Site and all the materials available on the Site are the property of GoLocalProv.com, LLC, and are protected by copyright, trademark, and other intellectual property laws.")

GoLocalProv.com

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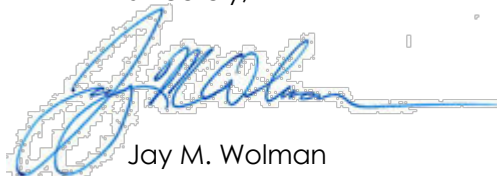
Given the evidence that we have compiled regarding your unlawful activities, you have until January 20, 2022, to comply with these demands and to provide the written confirmation of the same.

Finally, we demand that you pay a retroactive licensing fee of \$25,000 for your previous use of the images, as well as \$1,500 for attorney's fees.

If our client is forced to take legal action to stop your misconduct, we will seek the maximum damages available. We will also report your multiple infringements to Cloudflare, which we see is hosting your content for you.

We are looking forward to your prompt response and resolution of this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Wolman", with a long horizontal flourish extending to the right.

Jay M. Wolman

cc: Client (via separate email)